

# **EXHIBIT 32**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION,

Case No.  
3:23-md-03084-CRB

This Document Relates to:  
Jaylynn Dean v. Uber Technologies,  
Inc., et al., 3:23-cv-06708

VIDEOTAPED DEPOSITION OF JAYLYNN DEAN  
TAKEN ON BEHALF OF THE DEFENDANTS  
ON JUNE 27, 2025, BEGINNING AT 9:21 A.M. CST  
IN TULSA, OKLAHOMA

VIDEOTAPED BY: Lauren Kinnebrew  
REPORTED BY: D. Luke Epps, CSR, RPR  
Job No. CS7360417

1 does that sound correct, November 12th?

2 A Yes.

3 Q Okay. Had you ever ordered a ride using  
4 any other ride share app before then?

5 A Yes.

6 Q And what ride share app was that?

7 A Lyft and Waymo.

8 Q Waymo? Do you recall when you first  
9 downloaded the Lyft app?

10 A Whenever I started training.

11 Q Okay. Same question for Waymo. Is that  
12 also when you started training?

13 A It was a couple days after, I believe.

14 Q Okay. So is it correct to say that you  
15 hadn't downloaded any ride share apps before moving  
16 to Arizona for your training?

17 A That's true.

18 Q Okay. And while you were in training for  
19 your flight attendant school, you were staying in a  
20 SpringHill Suites hotel; is that right?

21 A Yes.

22 Q How many days a week were you in training?

23 A Six out of seven.

24 Q Okay. And what was your -- strike that.  
25 How were you getting to and from the training

1 facility during that period of time?

2 A We had a shuttle.

3 Q Shuttle. Okay. Were all the trainees  
4 staying at the SpringHill Suites?

5 A Yes. Some of them lived -- some of them  
6 were from the Phoenix area, so they lived there.

7 Q Okay. Do you recall how big your class  
8 was in that October, November 2023 time period?

9 A It was pretty large.

10 Q Any estimate as to how many?

11 A Either 25 to 30.

12 Q Okay.

13 A It was a pretty big class.

14 Q Do you recall how many of that class were  
15 staying at the SpringHill Suites?

16 A All of them except two.

17 Q Okay. And those two lived in the Phoenix  
18 area?

19 A Yes.

20 Q Do you have any estimate of how many total  
21 times you took an Uber before November 15th, 2023?

22 A I don't -- I don't remember. One or two,  
23 if not any. Like I said, I really took Lyfts more,  
24 Lyfts and Waymos.

25 Q Is there any reason that you took Lyfts

1 So it was really quick. Same thing, the second time  
2 was a hockey game in Dallas, and I was with my  
3 friend, and it was really quick, but both times were  
4 female drivers.

5 Q And those were when you used the Uber app  
6 to call those Ubers?

7 A Yes.

8 Q And was there a reason that you used Uber  
9 in those instances as opposed to Lyft or Waymo?

10 A Because there weren't any Lyft drivers  
11 in -- weren't any Lyft drivers in Stillwater that I  
12 saw, and then Elisa, my friend, she was who I was  
13 with at the hockey game, and she just ordered the  
14 Uber off my phone because she didn't have the app.

15 Q When you downloaded -- first downloaded  
16 the app in November of 2023, do you recall whether  
17 or not you did any research about Uber?

18 MS. ABRAMS: Object to form.

19 THE WITNESS: No. I just -- I heard  
20 things about it. Like I said, I downloaded three  
21 ride share apps. It was kind of just if I didn't  
22 have one, it's like I wanted a backup option, you  
23 know, and feel like Uber is a pretty big one, so I  
24 just downloaded it. That's the first one that  
25 popped up.

1 Q (BY MS. BLAKE) When you were in  
2 Louisville, did you have a car?

3 A No.

4 Q How did you get around if you were going  
5 someplace in Louisville?

6 A Friends or Lyfts.

7 Q Okay. Was there any reason that you  
8 weren't using Uber?

9 A Because Lyft had the woman option.

10 Q I've seen references to Ubers being  
11 expensive. Do you recall that being a reason that  
12 you weren't using Uber?

13 A Yeah. Just in general, like, ride share,  
14 it's expensive.

15 Q Hand you what I'm going to mark as  
16 Exhibit 15. You know I was going to wait to look at  
17 you. I couldn't remember. I apologize. Thank you.  
18 I know I've put in a lot of hard exhibits, but this  
19 one -- what is this one that we're looking at? What  
20 is this picture or these pictures?

21 (Exhibit 15 marked for identification.)

22 MS. ABRAMS: Object to form.

23 THE WITNESS: This is whenever I  
24 graduated.

25 Q (BY MS. BLAKE) And is this something that